## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

IN RE:	)
Verna B Christopher Debtors Address: 1900 Mountain Gate Pl Glen Allen, VA 23060	) Case No. 17-30633-KRH ) Chapter 13 )

Last four of SSN: 6645

### **DEBTOR'S OBJECTION TO PROOF OF CLAIM**

COMES NOW, the Debtor, **Verna B Christopher**, by counsel, and request this Honorable Court to Deny the claim made by Selene Finance LP, as a Secured claim. In support of the said Motion the debtor states the following:

- 1. That Selene Finance LP, filed a secured proof of claim (Claim #18), for \$385,569.18
- 2. That it is the debtor's belief that this claim should not be allowed because it was discharged in her chapter 7 bankruptcy (13-36765 KLP).

WHEREFORE, the Debtor respectfully request this Honorable Court to disallow the secured proof of claim filed by Selene Finance LP (Claim #18) for the amount of \$385,569.18.

Respectfully Submitted, Verna B Christopher

November 7, 2017

By: /s/ Joseph S. Massie, III Joseph S. Massie, III Of Counsel

I Ask For This:

/s/ Joseph S. Massie, III

Joseph S. Massie, III, Esq., VSB No. 35472 Massie Law Firm, P.C. 115 N 1<sup>st</sup> Street Ste 100 Richmond, Virginia 23219 (804) 644-4878 (804) 644-4874 Fax Case 17-30633-KRH Doc 40 Filed 11/07/17 Entered 11/07/17 11:34:44 Desc Main Document Page 2 of 4

Joseph S. Massie, III, Esquire (Bar No. 35472)

MASSIE LAW FIRM, PC

115 N 1st Street ste 100

Richmond, Virginia 23219

### **CERTIFICATE OF SERVICE**

I certify that on November 7, 2017, I sent, electronically, or mailed a true and exact copy of the foregoing Objection to Claim, first class mail, postage prepaid to all necessary parties.

By: /s/ Joseph S. Massie, III
Joseph S. Massie, III, Esq. (Bar No. 35472)
MASSIE LAW FIRM, PC
115 N 1st Street Ste 100
Richmond, Virginia 23219
804-644-4878

Trustee
Suzanne E. Wade
P.O. Box 1780
Richmond, VA 23218-1780
(804) 775-0979

804-644-4878

Verna B Christopher 1900 Mountain Gate Pl Glen Allen, VA 23060

Trustee
Carl M. Bates
P. O. Box 1819
Richmond, VA 23218
(804) 237-6800

Joseph S. Massie, III, Esq., VSB No. 35472

Massie Law Firm, P.C.

115 N 1<sup>st</sup> Street Ste 100

Richmond, Virginia 23219
(804) 644-4878
(804) 644-4874 Fax

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### **NOTICE OF OBJECTION**

Verna B Christopher has filed an objection to the proof of claim of Selene Finance LP

YOUR CLAIM MAY BE REDUCED, MODIFIED OR ELIMINATED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE.

If you do not want the Court to eliminate or change your claim, then within 30 days, you or your attorney must:

File with the Court, and serve a copy on the Trustee at the address shown below, a written response to this objection and a request for a hearing. Unless a written response is filed and served within 30days, the Court may decide that you do not oppose this objection to your claim, and the objection will be sustained and your claim will be disallowed. If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date specified above.

Court Trustee
U.S. Bankruptcy Court
William C. Redden, Clerk
701 East Broad Street, Suite 4000
Richmond, VA 23219

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: November 7, 2017

Last four of SSN: 6645

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Massie Law Firm, P.C.
115 N 1st Street ste 100
Richmond, Virginia 23219
(804) 644-4878
(804) 644-4874 Fax

### **CERTIFICATE OF SERVICE**

Joseph S. Massie, III, Esq., VSB No. 35472

Massie Law Firm, P.C.
115 N 1st Street Ste 100
Richmond, Virginia 23219
(804) 644-4878
(804) 644-4874 Fax

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I hereby certify that a true copy of the foregoing Notice was sent electronically or by first class mail, as appropriate, to all necessary parties.

November 7, 2017

/s/ Joseph S. Massie, III
Joseph S. Massie, III

Joseph S. Massie, III, Esq. (Bar No. 35472)

MASSIE LAW FIRM, PC

115 N 1st Street Ste 100

Richmond, Virginia 23219

804-644-4878

Trustee
Carl M. Bates
P. O. Box 1819
Richmond, VA 23218
(804) 237-6800

**Debtor Verna B Christopher**1900 Mountain Gate Pl
Glen Allen, VA 23060

MTGLQ investors, L.P Selene Finance LP 9990 Richmond Ave,ste 400s Houston, Tx 77042-4546

Joseph S. Massie, III, Esq., VSB No. 35472

Massie Law Firm, P.C.

115 N 1st Street Ste 100

Richmond, Virginia 23219
(804) 644-4878
(804) 644-4874 Fax